

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BRETT T. CULVER

Plaintiff,

v.

COMMONWEALTH OF PENNSYLVANIA,
et al.,

Defendants'

MOTION FOR AN ORDER
COMPELLING DISCOVERY

Case No. 1:cv-01-0904

(Judge Kane)

Plaintiff moves this court for an Order pursuant to Rule 37 (a) of the Federal Rules of Civil Procedure compelling Defendants' to answer fully interrogatories 01-cv-01-0904 (dated 03-01-02), copies of which are attached hereto. Plaintiff submitted these interrogatories pursuant to Rule 33 of the Federal Rules of Civil Procedure (or written request for disclosure pursuant to Rule 34 of the Federal Rules of Civil Procedure) on 03-01-02, but defendants' have to present refused to comply with disclosure of the itemized and identified information/record documentations/evidence of incidents cited in this case.

Plaintiff also moves for an Order pursuant to Rule 37 (a)(4) requiring the aforesaid defendants to pay Plaintiff the sum of \$2,500.00 as reasonable expenses in obtaining this Order, on the ground that the Defendants' refusals to answer the interrogatories (or produce documents/evidence upon request) had no substantial justification, and has hindered proceedings in this case.

This motion is based upon the papers and files in this matter, with this Plaintiff's legal right to the information, answers, and evidence relevant to all violations of complaint.

FILED
HARRISBURG, PA

OCT 22 2003

Dated: 10-15-03

MARY E. D'ANDREA, CLERK
Per _____
Deputy Clerk



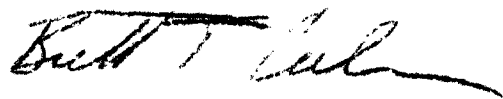
CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of each of the forgoing:
"PLAINTIFF'S RE-DIRECT OF MOTION TO COMPEL DISCOVERY,, REQUEST FOR PRODUCTION OF
DOCUMENTS,, MOTION FOR AN ORDER COMPELLING DISCOVERY,, COMPELLING DISCOVERY BRIEF,, was
sent, this date of 10-15-03, by First Class United States Mail to:

U.S. District Court
Clerk of Courts
228 Walnut Street
P.O. Box 983
Harrisburg, PA. 17108

Defendants in care of
Office of Attorney General
Maryanne Lewis
Strawberry Square
Harrisburg, Pa. 17120

Date: October 15, 2003



Brett T. Culver

NAME Brett Culver
NUMBER DD 3483
301 MOREA ROAD
FRACKVILLE, PA 17932

FILED
HARRISBURG, PA
OCT 22 2003
~~MARY E. D'ANDREA, CLERK~~
~~Deputy Clerk~~

U.S., District Court
Clerk of Courts
228 Walnut Street
P.O. Box 983
Harrisburg, PA, 17108

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